



Oil Spill Response

Facility Response Plans





Purpose of a Facility Response Plan



- Describes facility actions if a SPCC plan fails
 - Notifications
 - Incident Command System
 - Detailed response scenarios
 - Detailed drawings

DEFENSE FUEL SUPPORT POINT CHARLESTON HANAHAN, SOUTH CAROLINA FACILITY RESPONSE PLAN



Prepared for:
Defense Logistics Agency
Defense Fuel Supply Center
8725 John J. Kingman Road, Suite 4950
Fort Belvoir, Virginia 22060-6222

Under:
Southern Division
Naval Facilities Engineering Command
Charleston, South Carolina
Contract Number: N62467-89-D-03188073

Development Team:
Petroleum Partners
300 North Lee Street
Suite 201
Alexandria, Virginia 22314
(703) 684-2060

DECEMBER 2002
VOLUME 1 OF 2



Regulatory Requirements for a Facility Response Plan



- Not all facilities with an SPCC plan require a detailed FRP
- Non-Transportation Related (NTR) OPA 90 regulations of possible concern – 40 CFR 112
- If regulation criteria do not apply, a simplified response plan is still required - 40 CFR 112.7(a)(4) & (5)
- Personnel at a facility with an SPCC plan required to meet training requirements found in 40 CFR 112.7(f)





Regulatory Requirements for a Facility Response Plan – EPA NTR Substantial Harm Criteria



- Storage capacity \geq 1 million gallons & meets one of the following criteria in 40 CFR 112.20:
 - Secondary containment for each AST area is large enough to contain capacity of largest AST + precipitation freeboard
 - Discharge from the facility could cause harm to fish, wildlife & sensitive environments
 - Discharge from facility would shut down a public drinking water intake
 - Reportable discharge \geq 10K gallons in last 5 years





Regulatory Requirements for a Facility Response Plan - EPA NTR Substantial Harm Criteria



- Storage capacity \geq 42K gallons & transfers oil over water
 - Example – Recreational marina that fuels vessels with \geq 42K gallons of storage





Regulatory Requirements for a Facility Response Plan -

EPA NTR Special Circumstances



- EPA Regional Administrator (RA) may require FRP based on consideration of the following:
 - Type of transfer operation
 - Oil storage capacity
 - Lack of secondary containment
 - Proximity of fish, wildlife and sensitive areas
 - Proximity of drinking water wells
 - Spill History
 - Other site-specific characteristics & environmental factors





Regulatory Requirements for a Facility Response Plan -

EPA NTR Criteria



- Facilities that do not meet substantial harm criteria must:
 - Complete and maintain on file the certification found in Attachment C-II to Appendix C of 40 CFR 112
 - Certification must state that facility does not meet Substantial Harm Criteria
 - Failure to maintain certification will get attention of EPA inspectors





Contents of a Useful Facility Response Plan



Emergency Response Action Plan

- Red plan
- Notification list
- Briefing & tracking forms
- Response action plans
- Response personnel
- Equipment list
- Sensitive areas
- Disposal plan
- Evacuation plan
- Maps
- Public affairs plan
- Health & safety plan
- Security & communications

Facility Response Plan

- Facility Information
- Notification, personnel & equipment lists
- Hazard evaluation
- Scenarios
- Discharge detection systems
- Response resources
- Drills & Exercise procedures
- Communication
- MSDSs
- Natural Resource Damage Assessment (NRDA)
- Definitions, Acronyms, References



Exercising Your Facility Response Plan – 3-Year Training Cycle



- 12 Qualified Individual (QI) notification drills (1 per quarter)
- 3 Spill Management Team tabletop exercises - one involves a worst-case discharge scenario (1 per year)
- 3 unannounced exercises (1 per year)
 - Any exercise, with exception of QI Notification Drill, if conducted unannounced, will satisfy this requirement
 - 1 unannounced exercise must be an Equipment Deployment Exercise
 - A spill response will satisfy this requirement





Exercising Your Facility Response Plan



- 3-year training cycle (continued)
 - 6 facility-owned Equipment Deployment Exercises (for facilities with facility-owned equipment identified in their response plan) per year)
 - 3 Oil Spill Response Organization (OSRO) Equipment Deployment Exercises (spill response equipment to satisfy this requirement)





Exercising Your Facility Response Plan – Core Test Components of a Response Plan



Organizational Design	Operational Response	Response Support
Notifications	Discharge control	Communications
Staff Mobilization	Assessment of discharge	Transportation
Response Management System	Containment of discharge	Personnel Support
	Recovery of spilled material	Equipment maintenance & support
	Protection of sensitive areas	Procurement
	Disposal of recovered products	Documentation



Response Management System – The Role of the Emergency Coordinator



- Qualified Individual (QI) has authority to:
 - Activate/contract w/OSROs
 - Act as liaison w/FOSC
 - Obligate funds to carry-out response activities

EPA OPA 90 regulations allow QI & IC responsibilities to be done by separate individuals.

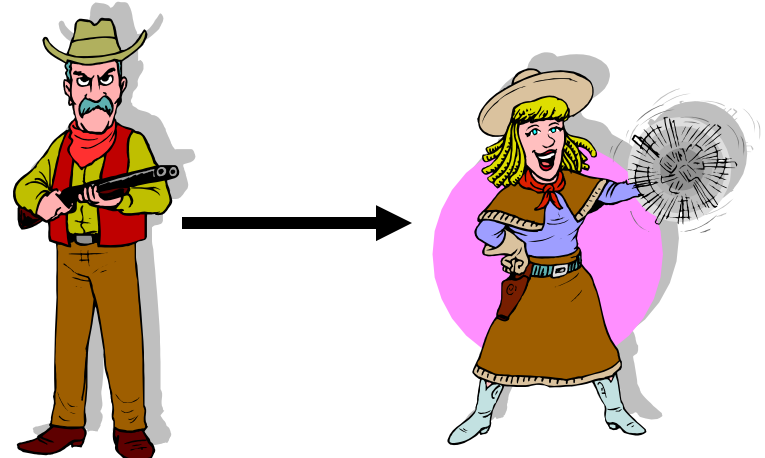
- Incident Commander (IC) responsibilities include:
 - Implementing FRP
 - Developing strategic objectives/response priorities
 - Approving incident action plans and other plans
 - Attend Unified Command meetings w/FOSC and regulators



Response Management System – The Importance of a Trained Emergency Coordinator



- What does trained mean?
 - Familiarity with contents of FRP
 - Participation in Table Top Exercises and Drills
- Why is it important?
 - Regulators watching performance during a spill
 - Knowledge of resources
 - Knowledge of personnel





Reporting Spills to DESC



- Initial Report

- Date of spill event
- Location
- Type of fuel released
- Amount of fuel released
- Cause of release
- Was release contained
- Amount of fuel recovered
- Impact to navigable waters

- Follow-on Report

- Cause of fuel release
- Status of repairs if required
- Need for a site assessment
- Need for further remediation
- Impact to groundwater

Email spill reports to:
desc.spillreports@dla.mil



DESC vice Military Service Responsibilities



- DESC provides funding for:
 - Development and update of SPCC plans and FRPs for facilities with DESC capitalized product
 - Cleanup of releases of DESC capitalized product
 - Repair/main facilities

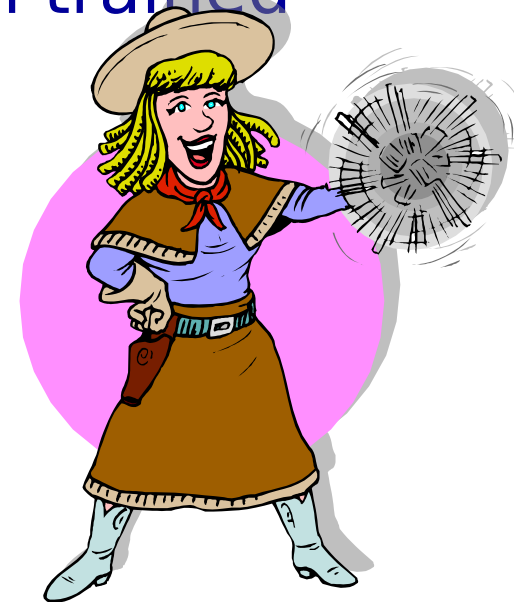




DESC vice Military Service Responsibilities



- Military Services responsible for:
 - Implementing repair/maintenance of storage facilities
 - Maintaining up-to-date SPCC plans and FRPs
 - Exercising the Response Plan with trained personnel





DESC Funding – OPA 90 Tabletop Exercises?



- Currently DESC not allowed to fund OPA 90 exercises
- DOD Directive 5101.8 – Executive Agent for Bulk Petroleum – may lead to changes
- Until then, funding is responsibility of military services



Panel Discussion



- Cindy Smith - DESC (703-767-8311)
- Josh Dickinson - PP (703-684-2060 x 1014)
- Frank Benkalowycz - PP (216-595-3566)
- Larry Bowers - PP (757-366-8731)
- Frank Marcinkowski - PP (703-684-2060 x 1017)